

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: Chapter 11 78-80 ST. MARKS PLACE, LLC,

Case No.: 21-12139 (MG)

Debtor.

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MARIANNE T. O'TOOLE, ESQ., solely in her capacity as the Chapter 7 Trustee of the estate of
78-80 St. Marks Place, LLC, Plaintiff, Adv. Pro. No.: 22-____ (MG)

against

LAWRENCE V. OTWAY, a/k/a LAWRENCE LORCAN OTWAY, a/k/a LORCAN OTWAY,
EUGENIE OTWAY a/k/a EUGENIE GILMORE-OTWAY a/k/a EUGENIE GILMORE,
SCHEIB'S PLACE, INC. D/B/A WILLIAM BARNACLE TAVERN, EXHIBITION OF THE
AMERICAN GANGSTER, INC., THEATRE 80, LLC, and JOHN DOE CORPORATIONS "1"
THROUGH "100", OTHER JOHN DOE ENTITIES "1" THROUGH "100", Defendants.

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AFFIDAVIT IN SUPPORT OF LORCAN OTWAY'S RESPONSE TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT

My name is David Siesel:

I have known Lorcan Otway since we were children where we both attended Grace Church School. I remember how frustrated I felt at times because most of us had the flexibility to meet after school or on the weekends to do various activities but Lorcan could not join us because he had a job working concessions and helping with maintenance in the Theater 80 St. Marks. By our last year in Grace, he also had a steady girlfriend, Diana Casper. They performed music in a folk trio with Suki Scott. Both Diana and Suki were close friends and I knew them both well.

In 1970, Diana developed a strong allergy to cats, and her parents allowed her to move into the guest room of Lorcan's parents' townhouse. When Lorcan's father found that they had been sleeping together, He had Lorcan and Diana move into one of the Townhouse floors, to give them more privacy. I was surprised that Lorcan had to pay rent given that he spent almost 100% of his free time working in the theater. I remember saying to him, that I thought his father was cheap and mean doing that. Diana and Lorcan lived in the building as any tenant would. They were a couple that had to do the normal things expected of two independent people living together in an apartment.

Lorcan explained to me that that Howard Otway, his father, was on his own at a very early age and had to be self-sufficient to survive. Howard felt his experience while hard, helped him with his success and that it built character. His father treated Lorcan, like a grown up and expected him to behave like one. When he and his father were at the theater, his father was definitely the boss. When he was told to do something, he would answer "Yes Sir" rather than "Yes, Dad". They had a sometimes strained but overall formal love between them.

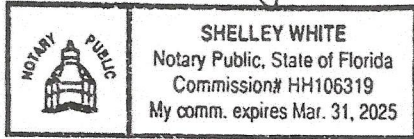
Lorcan has lived in the townhouse ever since he moved in with Diana in 1970, to the best of knowledge and he and his wife have been the force that has made the Theater 80 St. Marks a viable landmark theater all these many years.

Dated: 01/06/2023

David Siegel
DAVID SIESEL

Sworn to before me this
Day of Jan. 6, 2023

Shelley White
NOTARY PUBLIC



To whom it may concern,

Consider my plea to you to do the right thing by these extraordinarily worthy people.

I am Dana McCoy

I worked as a manager at Theatre 80 for several years. I met Lorcan Otway outside Theatre 80. We began talking and found we both worked in the same area of theater. I had been working for Louie Salamone and our conversation was about the difference in ethos between commercial versus not for profit theatre. Lorcan shared with me how his generation of theater owner had grown up in a different type of theater. Commercial Off Broadway still had the aspect of theater families who had not gone to college to learn theater business but rather their business reflected old theater culture and their family traditions. Many of that generation had grown up in theater families that were both family and business associates. Lorcan has met Louie on occasion and telling each other "Louie" stories became the basis of our friendship. When an opening became available to work at Theater 80, it just seemed a normal transition into another theater of the culture in which I was comfortable. I brought the Living Now AA group to rent meeting space at the theater which led Lorcan to joke to his mother, that as we had a tavern and an AA group, I had created a 100 percent market demographic for the theater. It impressed me that in order for the theater to survive, Lorcan and his mother had an integrated view of all the businesses within the building.

As his mother was still active in making decisions about the theater, theater business was not only discussed formally at staff meetings but on numerous occasions, I would accompany Lorcan, Genie (Eugenie) and Florence Otway on shopping trips to local markets. On these trips, theater business was commonly discussed, everything from scheduling to employee relationships and industry gossip. At the shops, I witnessed Lorcan paying for groceries and checking the totals against monthly rent figures. I remember that when the amount paid for groceries exceeded the rent in some months, Lorcan would laugh and say to his mother, that is the bonus for being a good landlord.

On our theatre related missions I was consistently surprised at the many professions at which Lorcan was inspired to excel, from songwriting to singing to boat building to harp playing to photography. But he had to make painful concessions to the balance between his care for his mother and his several careers outside of theater management. For example, in 2008, he had shot and written a centerfold spread for one of the papers he worked for. At that time his mother loved walking so he took her on the shoot with him. By 2011 her mobility issues meant that he simply did not take as many journalistic assignments; I watched how in order to supervise and grow the 3 businesses which sustained the building he had to finally stop performing and stop taking assignments as a journalist.

I know this was a difficult period in Lorcan's life. Allegations by his brother, picked up by one news entity and used in a single article in the press which gave the impression he was supported by the family business.

I never saw that, and can't imagine it. What I saw was Lorcan and Genie working 24/7 to create three world class businesses; the tavern, the museum, and the beloved theater. I saw Lorcan and Genie lovingly care for Florence in her old age till her passing, I saw them help everyone in the neighborhood. Lorcan would buy the kids at the group home on the block their first suits and teach them how to usher and help them have a sense of integrity through work. I know, because we all did together whatever was necessary to maintain the theater with Lorcan working at our sides. We scrubbed floors, painted baseboards or walls, we learned to make flats and scrims, run lights and sound, do box office, all of it. Lorcan taught us how.

I saw Lorcan employ homeless people to sweep the sidewalk and with their pay, he'd give them food. I saw Lorcan take chances on people no-one else did. I saw him offer the theatre to people for free if needed for memorials, community meetings, All I've ever seen is these people working themselves to the

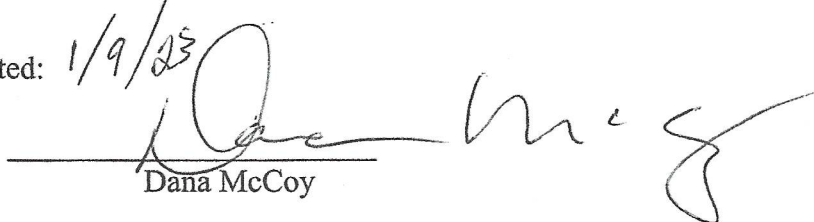
bone. So for me, the thought that Lorcan Otway took advantage of his family is not credible. It's not who he is. It's not who Genie is. And it's not what I saw. These people are practically super human in their efforts to save this landmark and important piece of their family history as well as New York's theater history.

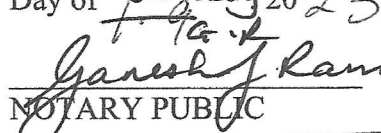
I personally found it frustrating that in the numerous articles and reports on his success in theater and other endeavors, the New York Post article that quoted his brother's as yet unchallenged allegations was the most widely read and the only one that was negative. The real story of Lorcan's work in his family is a boy of 10 helping his father dig coal to create a gorgeous raked theater, growing up in that theater and learning through hard work every aspect of the business.

I had never even SEEN Thomas, Lorcan's brother, until one day during the long settlement talks period, he came to the theater and I saw he was visibly both surprised and impressed and commented on the Creperie, the presentation at the tavern, the crowds going to the museum. I heard him say to Lorcan, "You have done wonderful things here." After he left, Lorcan told me with tears in his eyes "I think this is the first time in my life he complimented me."

Then during the hardest years in American theater, Lorcan grew the business so that the value of its brand was appraised at approximately half a million dollars a year. Unheard of!

Theater in New York needs Theatre 80 and Lorcan Otway as part of the recovery from this unprecedented natural disaster.

Dated: 1/9/23

Dana McCoy

Sworn to before me this 9
Day of January 2023

NOTARY PUBLIC

